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United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
CAROL MALDONADO VASQUEZ,  
  
Defendant.

CASE NO. 1:20-CR-00175-NODJ-BAM

STIPULATION TO SET CASE FOR CHANGE OF  
PLEA AND ORDER THEREON

**STIPULATION**

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for a status conference on May 8, 2024, at 1:00 p.m.
2. By this stipulation, defendant now moves to vacate the status conference and set the case for a change of plea hearing on June 10, 2024 at 8:30 a.m.
3. The parties agree and stipulate, and request that the Court find the following:
  - a) The discovery associated with this case includes case includes voluminous investigative reports, wire interceptions recordings and electronic messages, precise location information data, and cellular phone downloads, totaling thousands of pages of discovery and several gigabytes of electronic data.
  - b) Defense counsel requests the additional time to review the discovery, meet with his client, conduct independent investigation, and discuss a pretrial resolution with the

government. The government has provided a plea offer to the defense and defense counsel needs time to review that agreement with his client.

c) The defendant is currently out of custody.

d) Counsel for the defendant believes that failure to grant the above-requested continuance would deny him the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

e) The government does not object to the continuance.

f) The parties believe that time should be excluded, in that failure to grant the requested case schedule would unreasonably deny the defendant continuity of counsel, and unreasonably deny both the defendant and the government the reasonable time necessary for effective preparation, taking into account the parties' due diligence in prosecuting this case. 18 U.S.C. Section 3161(h)(7)(B)(iv). Based on the above-stated findings, the ends of justice served by the schedule as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act. Therefore, the parties request that the Court exclude the time through the change of plea hearing on June 10, 2024, from calculations under the Speedy Trial Act.

IT IS SO STIPULATED.

Dated: April 29, 2024

PHILLIP A. TALBERT  
United States Attorney

By: /s/ JUSTIN J. GILIO  
JUSTIN J. GILIO  
Assistant United States Attorney

Dated: April 29, 2024

/s/ Miles Harris  
Attorney for Defendant  
CAROL MALDONADO VASQUEZ

**ORDER**

IT IS SO ORDERED that the status conference set for May 8, 2024, is vacated. A change of plea hearing is set for **June 10, 2024, at 8:30 a.m. in Courtroom 5 before the District Court Judge**. Time is excluded pursuant to 18 U.S.C. Section 3161(h)(7)(B)(iv).

IT IS SO ORDERED.

Dated: April 30, 2024

/s/ Barbara A. McAuliffe  
UNITED STATES MAGISTRATE JUDGE